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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

Charles Baird, individually, and on behalf of all
others similarly situated, and on behalf of the
BlackRock Retirement Savings Plan,

Plaintiff,

v.

BlackRock Institutional Trust Company, N.A.;
BlackRock, Inc.; The BlackRock, Inc.
Retirement Committee; John and Jane Does 1-
40, Members of the BlackRock Retirement
Committee; The Administrative Committee of
the Retirement Committee; John and Jane Does
1-20, Members of the Administrative
Committee of the Retirement Committee; The
Investment Committee of the Retirement
Committee; John and Jane Does 21-40,
Members of the Investment Committee of the
Retirement Committee; each an individual, and
John and Jane Does 41-60, each an individual,

Defendants.

Case No. 17-cv-01892-HSG

**CASE MANAGEMENT STIPULATION
AND ORDER**

CASE MANAGEMENT STIPULATION
AND ORDER

Pursuant to this Court's Minute Entry of July 12, 2017, ECF No. 49, directing the parties to meet and confer regarding a proposed case schedule and to e-file a stipulation and proposed order proposing a case schedule, plaintiff Charles Baird and the named, non-Doe defendants (collectively, "BlackRock"), jointly submit this case management stipulation and Proposed Order.

The parties' proposed schedule departs somewhat from the guidelines set forth in this Court's Minute Entry but reflects the agreement of the parties following multiple telephonic conferences regarding an appropriate case schedule. The parties respectfully request that the Court allow the proposed departures, which together extend the case schedule by only six weeks.

| Event | Deadline |
|---|--|
| Beginning of fact discovery | Immediately |
| Substantial completion of document production | December 15, 2017 |
| Deadline to amend pleadings | January 8, 2018 (60 days before close of fact discovery) |
| Close of fact discovery | March 9, 2018 [Minute Entry: Feb. 9, 2018] |
| Parties exchange expert report(s) | April 6, 2018 |
| Parties exchange rebuttal expert report(s) | May 7, 2018 |
| Close of expert discovery | June 8, 2018 |
| Plaintiff's motion for class certification | June 21, 2018 [Minute Entry: May 28, 2018] |
| ADR | Late June/Early July |
| Opposition to motion for class certification | July 19, 2018 |
| Class certification reply brief | August 2, 2018 |
| Class certification hearing | August 16, 2018 [Minute Entry: July 5, 2018, 2 pm] |

Dated: July 26, 2017

COHEN MILSTEIN SELLERS & TOLL, PLLC

By:

/s/ Julia Horwitz
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Attorneys for Defendants

1 **ATTESTATION**

2 I attest that for all conformed signatures indicated by an “/s/,” the signatory has concurred
3 in the filing of this document.
4

5 Dated: August 3, 2017

By: /s/ Julia Horwitz

6 Julia Horwitz
7

8 **ORDER**

9 PURSUANT TO THE STIPULATION, IT IS SO ORDERED: The above Case
10 Management Stipulation and Proposed Order is approved as the Case Management Schedule for
11 this case and all parties shall comply with its provisions.

12 Dated: August 3, 2017



13 Judge Haywood S. Gilliam, Jr.
14 U.S. District Court for the
15 Northern District of California
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